UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF OHIO WESTERN DIVISION

SCOTT D. DALESANDRO and DIANNE

NOONAN, on behalf of themselves and

the certified Class, Case No. C-1-01-109

Plaintiffs,

Judge Sandra S. Beckwith v.

INTERNATIONAL PAPER COMPANY,

Defendant

JOINT MOTION TO EXTEND DATE FOR FINAL DISTRIBUTION AND ACCOUNTING

Defendant International Paper Company and Plaintiffs Scott Dalesandro and Diane Noonan, on behalf of themselves and the certified Class jointly move to extend the date of final distribution and accounting two weeks to February 28, 2006. The parties have been able to distribute funds to all but two Plaintiffs and are continuing to work to locate those individuals. Thus, the parties seek an additional two weeks to either locate those individuals or redistribute the remaining funds among the responsive class members, as set forth in the agreement, and then to file a full accounting to the Court.

Dated: February 14, 2006

Respectfully submitted,

s/ Theresa L. Groh

Theresa L. Groh (0029806)
John C. Murdock (0063749)
MURDOCK GOLDENBERG SCHNEIDER
& GROH, LPA
35 East Seventh Street, Suite 600
Cincinnati, OH 45202-2446

Phone: 513-345-8291 Fax: 513-345-8294

Attorneys for Plaintiffs and the Certified Class

s/ Grant S. Cowan___

Grant S.Cowan (0029667) FROST BROWN TODD LLC 2200 PNC Center 201 East Fifth Street Cincinnati, Ohio 45202-4182

Phone: 513-651-6800 Fax: 513-651-6981

e-mail: gcowan@fbtlaw.com

W. Carter Younger (VSB #01147) James P. McElligott, Jr. (VSB #14109) (Admitted Pro Hac Vice) McGuire Woods LLP One James Center Richmond, Virginia 23219

Phone: 804-775-4363 Fax: 804-698-2214

Attorneys for Defendant